

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NEXUS DISPLAY TECHNOLOGIES LLC,	§	Civil Action No. 2:14-cv-00762-RWS
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	
	§	
DELL INC.,	§	Civil Action No. 2:14-cv-00762-RWS
LENOVO (UNITED STATES) INC.,	§	Civil Action No. 2:14-cv-00763-RWS
NEC CORP., AND NEC DISPLAY	§	Civil Action No. 2:14-cv-00766-RWS
SOLUTIONS OF AMERICA, INC.,		(Consolidated Cases)
Defendants.		

**DEFENDANT LENOVO (UNITED STATES) INC.'S NOTICE OF JOINDER IN
DEFENDANT DELL INC.'S MOTION TO STRIKE PLAINTIFF'S UNTIMELY EXPERT
DECLARATION IN SUPPORT OF ITS CLAIM CONSTRUCTION BRIEF**

Defendant Lenovo (United States) Inc. ("Lenovo") respectfully files this notice joining in co-defendant Dell, Inc.'s ("Dell") "Motion to Strike Plaintiff's Untimely Expert Declaration in Support of Its Claim Construction Brief ("Motion")," and shows as follows:

1. On May 26, 2015, Dell filed its Motion to Strike Plaintiff's Untimely Expert Declaration in Support of Its Claim Construction Brief, which requests that the Court strike Plaintiff's proffered declaration of William H. Mangione-Smith (Dkt. No. 123-7) as untimely in light of P.R. 4-3(b) and 4-3(d). *See* Dkt. 128. Lenovo joins in Dell's Motion (Dkt. 128), adopting and asserting all arguments in the Motion and adopting and requesting all relief requested by the Motion. Lenovo respectfully asks that the Court strike Plaintiff's proffered declaration of William H. Mangione-Smith (Dkt. 123-7).

Dated: May 27, 2015

Respectfully submitted,

/s/ Eric J. Klein

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**ATTORNEYS FOR DEFENDANT LENOVO
(UNITED STATES) INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 27th day of May, 2015, with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Eric J. Klein

Eric J. Klein